

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13
:
Cristine Alyce Handler, :
: NO. 18-12457 MDC
:

ORDER

AND NOW, this day of ,2018, upon consideration of the Debtor(s) Objection to the Proof of Claim of Sortis Financial, Inc., any response thereto, and a hearing on the matter, it is hereby

ORDERED AND DECREED that the Debtor's Objection to the Proof of Claim of Sortis Financial, Inc., is SUSTAINED.

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OBJECTION TO PROOF OF CLAIM

AND NOW, this 4th day of October, 2018, Debtor hereby objects to the Proof of Claim filed on and behalf of Sortis Financial, Inc.

1. The Debtor objects to the ENTIRE PROOF OF CLAIM, as Sortis lacks standing to bring claim. Claimant does not have rights to be heard in a Pennsylvania Court where it is an unregistered foreign corporation. Upon information and belief, Sortis is NOT holder of claim.
2. The Debtor objects to the Proof of Claim as a loan modification documents are not attached.
3. The Debtor objects to the Proof of Claim to the extent that the amount stated is inaccurate and unenforceable.
4. The Debtor Objects to Proof of Claim as claimant does not have standing where it does not possess the original note nor has it established that its rights are perfected.
5. The Debtor objects to Proof of Claim as debtor does NOT owe any amounts under the claim.
4. The proof of claim is attached hereto as an exhibit.

WHEREFORE, Debtor(s) ask(s) this Honorable Court to deny the claims of Sortis Financial, Inc.

/S/ Paul A.R. Stewart, Esquire
Legal Helm, LLC
Attorney for Debtor

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DEBTOR'S REQUEST FOR PRODUCTIONS OF DOCUMENTS

Debtor through counsel request production of the following documents:

1. Copy of all relevant loan documents
2. A complete itemized accounting of all fees assessed on account.
3. A complete payment history made for escrow items, such as Real Estate Taxes and Property Insurance.
4. All written notices to debtor indicating change of any terms or conditions of note or mortgage. A copy of the original promissory note.

/S/ Paul A.R. Stewart, Esquire
Legal Helm, LLC
Paul A.R. Stewart, Esquire
Attorney for Debtor
333 East Lancaster Avenue
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Wynnewood, Pennsylvania
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Objection to Proof of Claim was served on October 5, 2018, by means of the Court's CM/ECF system or via first class mail, postage prepaid, upon the following:

Counsel for Bank

Udren Law Office
Walter William Gouldsbury, III
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003
856-669-5400

United States Trustee

833 Chestnut Street, Suite 500
Philadelphia, PA 19107

William C. Miller, Esquire (Trustee)

Chapter 13 Trustee
111 S. Independence Mall, Suite 583
Philadelphia, PA 19106
and
1234 MARKET STREET, SUITE 1813
PHILADELPHIA, PA 19107

/S/ Paul A.R. Stewart, Esquire
Legal Helm, LLC
Paul A.R. Stewart, Esquire
Attorney for Debtor